

Ex. 2

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

MISTY BLANCHETTE PORTER,
M.D.,

Plaintiff,

v.

DARTMOUTH-HITCHCOCK
MEDICAL CENTER,
DARTMOUTH-HITCHCOCK
CLINIC, MARY HITCHCOCK
MEMORIAL HOSPITAL, and
DARTMOUTH-HITCHCOCK
HEALTH,

Defendants.

Docket No. 2:17-CV-194

DECLARATION OF ATTORNEY ERIC D. JONES

1. I make this declaration in support of Plaintiff’s Motion for Attorneys’ Fees (the “Motion”) in the above-captioned matter.

Qualifications

2. I have been admitted to practice law since 1994. I have worked at Langrock Sperry & Wool, LLP (“LSW”) since 2019, and have been a partner of the firm since 2021. Before practicing at LSW, I was a partner of the firm WrightJones PLC (2014-2019), and a partner of Downs Rachlin Martin PLLC (“DRM”)(2002-2014), where I served for several years as the Chair of the Labor and Employment Practice Group. Before DRM, I was a member of the firm Vitt & Jones, PLC (1999-2002). I started my legal career as an Associate at Brooks, McNally, Whittington, Platto & Vitt (1994-1999). My practice over the past three decades has consisted almost entirely of employment and labor law, on behalf of both employers and employees, including litigation of labor and employment disputes.

3. I have represented numerous individual and business clients in litigation throughout Vermont and New Hampshire; I have also handled labor and employment litigations on a *pro hac vice* basis in numerous federal courts throughout the Country (including the Southern District of New York and the Northern District of Illinois). I am admitted to practice before the state and federal courts of Vermont and New Hampshire, the United States Courts of Appeals for the Second and Fourth Circuits, and the United States Supreme Court. I have tried many cases to verdict, including both bench and jury trials, and administrative trials before the National Labor Relations Board Division of Judges. I also have extensive experience handling labor arbitration disputes.

Fees and Billing

4. In October 2024, Plaintiff Misty Blanchett Porter, M.D., engaged LSW to join her trial team. LSW agreed to represent Dr. Porter on a contingency fee basis; if Dr. Porter did not prevail, LSW would not receive a fee.

5. In October 2024, my normal and customary hourly rate was \$375; effective January 1, 2025, my normal and customary hourly rate was increased to \$395.

6. These were the rates I commonly charged, and have been paid by, my hourly clients, and I believe that these were reasonable rates at the time in this state, in light of my experience, training, and skill. In my opinion, the rates charged by other attorneys in this firm were also reasonable given their respective circumstances and given that other hourly clients readily paid those rates.

7. Attached as Exhibit A is a statement of all time recorded by LSW lawyers and paralegals through the filing of the Motion. On this statement, I have applied my normal and customary hourly rates of \$375 in 2024 and \$395 in 2025.

8. It is my practice, and the policy of LSW, to keep time records of work performed on a case contemporaneous with doing the work, making entries throughout the day as I perform various tasks. The statement attached as Exhibit A is based on my contemporaneous time records, and those of other professionals in the firm.

9. Overall, the amount of time expended on this matter was reasonable and appropriate, based on my experience.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Burlington, Vermont this 7th day of May, 2025.

LANGROCK SPERRY & WOOL, LLP



Eric D. Jones
210 College Street STE 400
Burlington, VT 05401
ejones@langrock.com
Phone: (802) 864-0217

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Misty B. Porter
mbporter@me.com

May 07, 2025
Client: 272397
Matter: 000001
Invoice #: 254177
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RE: Claim against DHMC et al.

For Professional Services Rendered Through May 07, 2025

Federal Tax I.D. No.: 03-0283046

Total Services	\$165,380.50
Total Current Charges	\$165,380.50
PAY THIS AMOUNT	\$165,380.50

Remittance Advice

Payment is due 15 days from the invoice date.

If paying by check, please reference the invoice number or return this remittance page with your payment. Thank you.

Check Payable To:

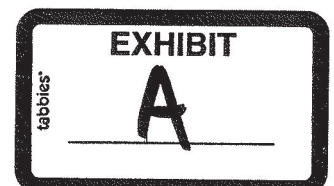
Langrock Sperry & Wool, LLP
Attn.: Accounts Receivable
111 S. Pleasant St.
Middlebury, VT 05753

eCheck & Credit Card:

Payments can be made by eCheck, American Express, Discover, MasterCard & VISA. To make a secure payment online, please [click here](https://langrock.com/payments/) or type the following information into your browser: <https://langrock.com/payments/>

MIDDLEBURY: 111 S. Pleasant St., Middlebury, VT 05753 | 802.388.6356
BURLINGTON: 210 College St., Suite 400, Burlington, VT 05401 | 802.864.0217

A Limited Liability Partnership Including a Professional Corporation



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Misty B. Porter
mbporter@me.com

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RE: Claim against DHMC et al.

For Professional Services Rendered Through May 07, 2025

Federal Tax I.D. No.: 03-0283046

SERVICES

Date	Person	Description of Services	Hours	Amount
10/02/2024	EDJ	Review and analyze background materials; analyze trial plan and strategy; analyze negotiation status; correspondence with Geoffrey Vitt regarding status.	1.00	\$375.00
10/03/2024	EDJ	Review and analyze background material; analyze trial strategy.	1.00	\$375.00
10/08/2024	EDJ	Telephone conference with Geoffrey Vitt regarding status and trial issues.	0.50	\$187.50
10/16/2024	EDJ	Review and analyze trial planning tasks and strategy; review correspondence with special master regarding efforts to restart mediation.	0.50	\$187.50
10/17/2024	EDJ	Conference with Misty Porter, Geoffrey Vitt and Sarah Nunan regarding status and trial preparation strategy.	1.00	\$375.00
10/21/2024	EDJ	Review and analyze draft motion for status conference; draft proposed revisions to motion; correspondence with Geoffrey Vitt regarding same.	0.70	\$262.50
10/28/2024	EDJ	Review and analyze pleadings and substantive motion papers to study factual record and positions asserted by the parties.	1.50	\$562.50
10/29/2024	EDJ	Review and analyze record materials to assess facts and positions in preparation for trial planning.	3.50	\$1,312.50
10/30/2024	EDJ	Review and analyze evidence; analyze trial strategy and pre-trial motions; correspondence with Geoffrey Vitt regarding status conference issues.	1.50	\$562.50
10/31/2024	EDJ	File notice of appearance; continue detailed review of record materials to assess facts and positions.	2.50	\$937.50
11/04/2024	EDJ	Review and analyze DHMC's opposition to motion for status conference and assess reply position.	0.30	\$112.50
11/05/2024	EDJ	Telephone conference with Geoffrey Vitt regarding DH opposition to motion for status conference; draft revisions to draft reply memorandum; review and analyze Mr. Vitt's issues for pre-trial resolution.	0.80	\$300.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
11/07/2024	EDJ	Research subpoena and service issues; correspondence with Geoffrey Vitt regarding same.	0.50	\$187.50
11/11/2024	EDJ	Correspondence with Geoffrey Vitt regarding strategy issues.	0.50	\$187.50
11/19/2024	EDJ	Telephone conference with Geoffrey Vitt regarding pre-trial planning.	0.50	\$187.50
11/21/2024	EDJ	Correspondence with Geoffrey Vitt regarding status, and client leave of absence issue.	0.30	\$112.50
12/04/2024	EDJ	Detailed review and analysis of record, evidence, and positions to prepare for trial preparation conference and trial planning.	3.50	\$1,312.50
12/10/2024	EDJ	Conference with Sarah Nunan and Geoffrey Vitt regarding trial planning and trial strategy; review and analyze case elements chart and witness list; review and analyze evidence.	5.00	\$1,875.00
12/11/2024	EDJ	Analyze case presentation and trial strategy; review and analyze Vitt memorandum regarding trial presentation.	2.00	\$750.00
12/13/2024	EDJ	Analyze trial themes memo; analyze trial presentation, witnesses and exhibits.	1.00	\$375.00
12/17/2024	EDJ	Review and analyze documents regarding witnesses; analyze trial presentation strategy; video conference with Geoffrey Vitt and Sarah Nunan regarding trial preparation; research HIPAA issues regarding witness examinations.	5.00	\$1,875.00
12/18/2024	BRG	Review of HIPAA Privacy Rule.	0.50	\$112.50
12/20/2024	EDJ	Outline themes for opening statement; analyze case presentation.	1.00	\$375.00
12/30/2024	EDJ	Review and analyze draft supplemental interrogatory answers; draft revisions; correspondence with Geoffrey Vitt and Sarah Nunan regarding same; analyze legal analysis regarding HIPAA issues at trial.	1.50	\$562.50
12/30/2024	BRG	Review of HIPAA privacy rule and state statute regarding patient privilege.	1.50	\$337.50
01/02/2025	EDJ	correspondence with Geoffrey Vitt and Sarah Nunan regarding case presentation.	0.50	\$187.50
01/06/2025	EDJ	Review and analyze memorandum from Geoffrey Vitt regarding status conference; preparation for status conference; correspondence with Geoffrey Vitt regarding pre-trial motions and status conference.	1.50	\$592.50
01/08/2025	EDJ	Correspondence with Geoffrey Vitt regarding pre-conference filing; prepare for trial conference; analyze trial strategy.	1.00	\$395.00
01/09/2025	EDJ	Analyze trial preparation; vide conference with plaintiff attorney team to plan trial preparation and prepare for pre trial conference.	2.30	\$908.50
01/10/2025	EDJ	Conference with SLL regarding juror questionnaires and trial preparation; review and analyze draft statement regarding case from Misty Porter; correspondence with counsel regarding draft statement and proposed revisions; review local rules regarding exhibits and voir dire.	1.80	\$711.00
01/10/2025	SLL	Intra-office conference with Attorney Eric D. Jones regarding trial preparation; review client file; review Local Rules, voir dire process; telephone conference with court clerk regarding jury questionnaires.	0.80	\$124.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
01/13/2025	EDJ	Preparation for pre-trial conference; meeting with Geoffrey Vitt and Sarah Nunan regarding pre-trial conference; attend pre-trial conference.	3.40	\$1,343.00
01/14/2025	EDJ	Research in support of motion to unseal documents; correspondence with Geoffrey Vitt regarding same.	1.00	\$395.00
01/15/2025	EDJ	Legal research punitive damages and jury instruction issues; video conference with Plaintiff's trial team.	1.50	\$592.50
01/20/2025	EDJ	Analyze punitive damages standards.	0.80	\$316.00
01/22/2025	EDJ	Video conference with trial team to prepare for trial; review and analyze update claims chart.	1.50	\$592.50
01/25/2025	EDJ	Review and analyze witness interview memos.	0.50	\$197.50
01/27/2025	EDJ	Review and analyze draft opening statement; draft revisions.	1.50	\$592.50
01/30/2025	EDJ	Review and analyze draft motion to unseal; research local rules; review and analyze draft opening statement; review and analyze case preparation chart; video conference with counsel team regarding trial preparation.	1.80	\$711.00
02/03/2025	EDJ	Review and analyze revised motion to unseal documents; correspondence with plaintiff's trial team regarding same; correspondence with Geoffrey Vitt regarding settlement issues; analyze opening statement.	1.70	\$671.50
02/04/2025	EDJ	Review and analyze opening statement; draft proposed revisions to opening statement; review revised motion to unseal records.	2.80	\$1,106.00
02/05/2025	EDJ	Video conference with trial team regarding trial preparation.	1.00	\$395.00
02/19/2025	EDJ	Review and analyze defendants' opposition to motion to unseal documents; analyze reply positions and strategy; video conference with trial team regarding strategy and trial preparation.	2.00	\$790.00
02/21/2025	EDJ	Review and analyze five motions in limine filed by DHMC; analyze strategy and positions for reply briefing; review and analyze draft opposition to motion based on Cat's Paw theory; legal research regarding motions in limine; draft reply memorandum regarding motion to unseal documents.	5.00	\$1,975.00
02/24/2025	EDJ	Review and analyze expert testimony issue to prepare response to motion in limine; legal research regarding Daubert standards; outline response arguments; video conference with Bob Bancroft regarding response to motion in limine; review and analyze expert reports and materials; review and analyze Bancroft deposition.	4.60	\$1,817.00
02/24/2025	WER	Research Motion in Limine and Daubert Motion standards.	0.25	\$62.50
02/25/2025	EDJ	Review and analyze materials regarding motion in limine to exclude expert testimony; draft opposition memorandum; legal research in support of opposition; telephone conference with Sarah Nunan and Geoffrey Vitt regarding witnesses.	7.50	\$2,962.50
02/26/2025	EDJ	Draft opposition to motion to exclude expert testimony; video conference with trial team regarding trial preparation; review and analyze draft opposition to motion in limine regarding other physicians.	3.50	\$1,382.50
02/27/2025	EDJ	Review and analyze draft opposition to motion in limine regarding plaintiff's qualifications; analyze arguments in opposition to collateral motions in limine.	2.50	\$987.50

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SERVICES

Date	Person	Description of Services	Hours	Amount
02/28/2025	EDJ	Review and analyze opposition to motion to quash trial subpoena; draft response to defense counsel's letter regarding alleged ex parte communications; final review of oppositions to motions in limine.	1.50	\$592.50
03/01/2025	EDJ	Telephone conference with Geoffrey Vitt and Sarah Nunan regarding status and response to motions in limine.	0.30	\$118.50
03/03/2025	AJB	Intra-office conference with Attorney Eric D. Jones regarding jury instructions.	0.20	\$83.00
03/03/2025	EDJ	Conference with Sarah Nunan regarding trial preparation plan; evidence training at federal court house; analyze jury instructions; analyze witness list; draft correspondence with Defense counsel regarding alleged ex parte communication; telephone conference with Geoffrey Vitt regarding damages issues; legal research regarding damages issues.	4.50	\$1,777.50
03/03/2025	SLL	Tech overview at courthouse.	0.50	\$77.50
03/04/2025	EDJ	Video conference with trial team regarding trial preparation; research voir dire issues; research Vermont health care whistle-blower statute; prepare for witness interviews and witness testimony outlines; review and analyze draft witness outline.	4.70	\$1,856.50
03/04/2025	SLL	Telephone conference with Clerk's office regarding jury panel; e-mail messages with Attorney Eric D. Jones.	0.20	\$31.00
03/05/2025	EDJ	Telephone conference with Sarah Nunan regarding trial preparation; video conference with trial team regarding status and trial preparation; meeting with witness regarding trial testimony; draft amended complaint; review and analyze documents for exhibits; review and analyze juror questionnaires; review and analyze deposition of Maria Padin.	7.50	\$2,962.50
03/05/2025	SLL	Receipt of jury questionnaires from Clerk's office; e-mail messages with Clerk's office; Intra-office conference with Attorney Eric D. Jones regarding jury panel.	0.30	\$46.50
03/05/2025	SLL	Prepare of summary of jurors; e-mail messages with Attorney Eric D. Jones.	1.40	\$217.00
03/06/2025	AJB	Draft and revise jury instructions.	4.00	\$1,660.00
03/06/2025	EDJ	Preparation for motions hearing; analyze hearing on damages expert; review and analyze juror questionnaires; preparation for voir dire; video conference with trial team to prepare for trial; review and analyze Merrens deposition to prepare for trial testimony.	7.50	\$2,962.50
03/07/2025	AJB	Draft and revise jury instructions; legal research regarding the same; intra-office conferences with Attorney Eric D. Jones regarding the same.	4.90	\$2,033.50
03/07/2025	EDJ	Review and analyze draft motion to amend complaint; correspondence with trial team regarding same; video conference with trial team regarding trial preparation; video conference with witness regarding testimony; update witness outline; analyze trial presentation strategy; analyze jury instructions; review reply briefing regarding motions in limine; review and revise proposed jury instructions; review and analyze proposed witness list.	6.70	\$2,646.50

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SERVICES

Date	Person	Description of Services	Hours	Amount
03/08/2025	EDJ	Draft jury instructions; review and analyze witness list; draft witness outlines.	3.80	\$1,501.00
03/09/2025	EDJ	Revise jury instructions; draft witness outline prepare for trial.	2.50	\$987.50
03/10/2025	EDJ	Legal research damages issues (including gross up awards and front pay) and expert testimony issues in preparation for motion in limine hearing; review and analyze proposed witness list; video conference with trial team to prepare for trial; video conference with witness regarding trial preparation; review and analyze exhibits for disclosure on exhibit list; review draft jury instructions and prepare same for filing and service; preparation for meeting with Dr. Bancroft to prepare for hearing; review and analyze defendants' pre-trial filings.	7.80	\$3,081.00
03/11/2025	EDJ	Review and analyze DH's pre-trial submissions (jury instructions, exhibit list, witness list, reply brief, etc.); Correspondence with Bob Bancroft regarding Daubert motion; preparation for motions hearing; video conference with trial team; outline oral arguments regarding cat's paw theory.	5.00	\$1,975.00
03/12/2025	AJB	Receipt and review of defendants' proposed jury instructions; Intra-office conference with Attorney Eric D. Jones regarding the same.	0.50	\$207.50
03/12/2025	EDJ	Preparation for hearing on pre-trial motions; video conference with trial team; preparation for trial; legal research regarding Cat's Paw issues.	6.50	\$2,567.50
03/13/2025	EDJ	Research in support of positions for motions hearing; preparation for motions hearing; preparation for trial; video conference with trial team regarding trial.	6.50	\$2,567.50
03/14/2025	EDJ	Preparation for pretrial motions hearing; correspondence with Bob Bancroft regarding same; correspondence with client regarding same; attend court hearing; correspondence with client regarding status post-hearing.	8.00	\$3,160.00
03/14/2025	SLL	Revise jury list; prepare jury stickers; e-mail messages with Attorney Eric D. Jones.	1.20	\$186.00
03/16/2025	EDJ	Preparation for trial; analyze evidentiary issues; outline Maria Padin testimony; review and analyze documents for exhibits.	5.00	\$1,975.00
03/17/2025	EDJ	Prepare for trial (prepare witness outlines; review and analyze exhibits to assess stipulations; meet with witnesses to prepare for trial; prepare for voir dire).	8.00	\$3,160.00
03/17/2025	SLL	Intra-office conferences with team; extract and organize Defendants' exhibits from documents produced.	3.60	\$558.00
03/18/2025	EDJ	Conference with court personnel regarding court room issues; preparation for trial (damages analysis, conference with Bob Bancroft, conferences with witnesses; outline testimony and evidence; review and analyze juror questionnaires).	8.50	\$3,357.50
03/18/2025	SLL	Prepare trial exhibit binders.	3.80	\$589.00
03/18/2025	SLL	Prepare trial exhibit binders; receipt and review of e-mail message from USDC with juror update; revise jury stickers/spreadsheet; intra-office conference with Attorney Eric D. Jones.	3.30	\$511.50

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SERVICES

Date	Person	Description of Services	Hours	Amount
03/19/2025	EDJ	Preparation for trial (prepare Misty Porter testimony, review and analyze exhibits, review and analyze opening statement, prepare voir dire; review and analyze Merrens testimony to prepare for cross).	8.80	\$3,476.00
03/19/2025	SLL	Prepare trial exhibit binders; prepare jury box board.	3.80	\$589.00
03/20/2025	EDJ	Trial preparation (voir dire outline, analyze damages and expert testimony, prepare cross examination).	6.80	\$2,686.00
03/20/2025	SLL	Prepare trial exhibit binders.	2.70	\$418.50
03/21/2025	EDJ	Preparation for trial; draft response to Defendants' renewed motion to exclude expert testimony; draft outlines for testimony and cross examination; review and analyze exhibits.	7.00	\$2,765.00
03/21/2025	SLL	Prepare trial exhibit binders (Porter and DH); receipt and review of e-mail message from USDC with juror update; revise jury info spreadsheet and stickers; e-mail messages with Attorney Eric D. Jones; meeting with team.	5.20	\$806.00
03/22/2025	EDJ	Preparation for trial (voir dire outline; opening statement; cross examination outline; exhibit review).	6.00	\$2,370.00
03/23/2025	EDJ	Preparation for trial.	9.00	\$3,555.00
03/23/2025	SLL	Prepare trial exhibit binders; meet with team.	5.70	\$883.50
03/24/2025	EDJ	Preparation for trial; attend trial; prepare for continued trial.	12.00	\$4,740.00
03/24/2025	SLL	[NO CHARGE] Attend jury draw.	9.00	\$0.00
03/25/2025	EDJ	Preparation for trial; attend trial; prepare for continued trial.	11.50	\$4,542.50
03/25/2025	SLL	Prepare trial exhibit binders.	1.00	\$155.00
03/25/2025	SLL	[NO CHARGE] Attend trial.	1.00	\$0.00
03/26/2025	EDJ	Preparation for trial; trial; prepare for continued trial.	11.00	\$4,345.00
03/26/2025	SLL	Prepare trial exhibit binders.	0.80	\$124.00
03/26/2025	SLL	[NO CHARGE] Attend trial.	1.80	\$0.00
03/26/2025	SLL	Review e-mail message from Attorney Megan Martinez with list of missing items; review documents produced; update trial exhibit binders with missing items; telephone conferences and e-mail messages with Attorney Eric D. Jones and Attorney Sarah Nunan; prepare subpoenas and witness checks for Navid Esfandiari, Emily Baker, Katrina Thorstensen, Dennis Seguin; deliver same to court; meet with team.	4.00	\$620.00
03/27/2025	EDJ	Preparation for trial; attend trial; prepare for continued trial.	12.00	\$4,740.00
03/28/2025	EDJ	Preparation for trial; trial; conference with trial team.	9.50	\$3,752.50
03/29/2025	EDJ	Prepare for continued trial; prepare examination of Ed Merrens; review and analyze Defendant's motion regarding Dr. Bancroft; outline response arguments.	9.50	\$3,752.50
03/30/2025	EDJ	Prepare for trial; review and revise opposition to third motion in limine regarding Dr. Bancroft.	7.00	\$2,765.00
03/31/2025	EDJ	Preparation for trial; trial; preparation for continuation of trial.	11.50	\$4,542.50
04/01/2025	EDJ	Prepare for trial; trial; preparation for continued trial.	12.50	\$4,937.50
04/02/2025	EDJ	Prepare for trial; trial; prepare for continued trial.	11.50	\$4,542.50

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SERVICES

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04/03/2025	EDJ	Prepare for continued trial; trial; preparation for continued trial.	12.00	\$4,740.00
04/04/2025	EDJ	Prepare for trial; trial; draft closing argument.	8.00	\$3,160.00
04/05/2025	EDJ	Draft Closing arguments; review and analyze proposed jury instructions; conference with trial team.	6.00	\$2,370.00
04/06/2025	EDJ	Draft closing argument; conference with trial team.	6.50	\$2,567.50
04/07/2025	EDJ	Review and analyze jury instructions; attend charge conference; review and analyze renewed motions to preclude; preparation for closing argument.	7.00	\$2,765.00
04/08/2025	EDJ	Trial.	6.00	\$2,370.00
04/09/2025	EDJ	Attend hearing regarding jury request for testimony; analyze positions; research jury access to transcripts.	1.00	\$395.00
04/10/2025	EDJ	Research jury access to transcripts; outline positions regarding same; attend court hearing regarding transcripts; attend hearing.	4.50	\$1,777.50
04/14/2025	EDJ	Analyze post trial issues; research fee petition issues.	1.30	\$513.50
04/15/2025	EDJ	Research recovery of fees and costs; review and analyze attorneys' fees and costs entries.	1.50	\$592.50
04/16/2025	EDJ	Research in support of fee petition; analyze post trial motions and positions (interest, costs, fees, etc.).	1.50	\$592.50
04/18/2025	EDJ	Draft fee petition; draft revisions to motion for pre-judgment interest; telephone conference with Geoffrey Vitt and Sarah Merlo regarding prejudgment interest issues.	2.40	\$948.00
04/21/2025	EDJ	Analysis of interest calculations in support of motion for prejudgment interest; outline arguments for motion for pre-judgment interest.	0.80	\$316.00
04/23/2025	EDJ	Review and analyze draft motion for interest; review DH message regarding motion for clarification; telephone conference with Geoffrey Judd Vitt and Sarah Nunan regarding post trial motions and positions.	0.80	\$316.00
04/28/2025	EDJ	Review and analyze judgment, notice to litigants, and post-verdict motions; analyze strategy and positions; research motion to alter or amend the judgment; video conference with trial team regarding post-verdict motions.	1.80	\$711.00
04/30/2025	EDJ	Draft papers in support of motion for attorneys' fees and bill of costs; research in support of motions.	3.50	\$1,382.50
05/01/2025	EDJ	Draft revisions to fee petition papers.	0.80	\$316.00
05/05/2025	EDJ	Review and revise papers in support of fee petition; research motion to alter or amend the judgment.	1.30	\$513.50
05/06/2025	EDJ	Video conference with Porter team regarding post-trial motions and issues; revise declaration in support of motion for fees; draft revisions to motion for fees; outline motion to alter or amend the judgment.	1.20	\$474.00
05/07/2025	EDJ	Final review of and revisions to papers in support of fee petition, and motion to alter or amend the judgment.	1.00	\$395.00
Total Professional Services			456.05	\$165,380.50

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PERSON RECAP

Person			Hours	Rate	Amount
AJB	Alison J. Bell	Partner	9.60	\$415.00	\$3,984.00
EDJ	Eric D. Jones	Partner	358.00	\$395.00	\$141,410.00
EDJ	Eric D. Jones	Partner	36.10	\$375.00	\$13,537.50
WER	Wendy E. Radcliff	Associate	0.25	\$250.00	\$62.50
BRG	Bridget R. Grace	Associate	2.00	\$225.00	\$450.00
SLL	Sheri L. Lehouiller	Paralegal	11.80	\$0.00	\$0.00
SLL	Sheri L. Lehouiller	Paralegal	38.30	\$155.00	\$5,936.50
Total Services					\$165,380.50
Total Current Charges					\$165,380.50
PAY THIS AMOUNT					\$165,380.50